

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

METROPOLITAN TRANSPORTATION
AUTHORITY, *et al.*,

Plaintiffs,

v.

SEAN DUFFY, in his official capacity as
Secretary of the United States Department of
Transportation, *et al.*,

Defendants.

Civil Action No. 1:25-cv-1413 LJL

Notice of Motion

ORAL ARGUMENT REQUESTED

Hon. Lewis J. Liman

PLEASE TAKE NOTICE that, upon the annexed Memorandum of Law any further submissions made hereafter, before the Honorable Lewis J. Liman, at the United States Court House, 500 Pearl Street, New York, New York 10007, at a date and time to be set by the Court, movants Environmental Defense Fund, through their undersigned counsel, will move this Court for an Order granting leave to file a brief as *amicus curiae* and granting such other and further relief as the Court deems just and proper.

Dated: May 15, 2025

Respectfully submitted,

/s/ Andrew D. Otis

Andrew D. Otis

Karen Steinberg Kennedy

KRAMER LEVIN NAFTALIS &
FRANKEL LLP

1177 Avenue of the Americas
New York, New York 10036
(212) 715-9100
Aotis@kramerlevin.com
Kkennedy@kramerlevin.com

Charles S. Warren
McLAUGHLIN & STERN, LLP
260 Madison Avenue
New York, New York 10016
(212) 448-1100
CWarren@mclaughlinstern.com

Eric A. Goldstein
Mark A. Izeman
NATURAL RESOURCES
DEFENSE COUNCIL
40 West 20th Street, 11th Floor
New York, New York 10011
Telephone: (212) 727-2700
Egoldstein@nrdc.org
Mizeman@nrdc.org